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FILE NO.: 4457.0013

June 30, 2025

By ECF

Honorable Steven L. Tiscione
United States Magistrate Judge
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722

Re: Thomson v. The Research Foundation for the SUNY
Docket No. 2:24-CV-00037

Dear Judge Tiscione:

We represent Defendant The Research Foundation for The State University of New York in the above-referenced matter. We write jointly with counsel for Plaintiff Donna Thomson (together, the “Parties”) in response to the Court’s June 23, 2025 Order, which directed the Parties to provide deposition dates for the remaining intended deponents, Danielle Rubino and Dr. Jeffrey Low.

Dr. Jeffrey Low is scheduled to be deposed on August 22, 2025, beginning at 10:00 A.M.

With respect to Ms. Danielle Rubino, she is currently out of the office on an authorized extended absence through mid-July. The Parties have conferred and agree to work collaboratively to schedule her deposition at the earliest practicable date upon her return. Accordingly, the Parties respectfully request leave to submit a supplemental letter providing an update on Ms. Rubino’s deposition by August 1, 2025.

Should the Court require additional information or wish to discuss this matter further, the Parties are available for a telephonic conference at the Court’s convenience.

We thank the Court for its time and attention to this matter.

Respectfully submitted

/s/ Angeliou Schillinger

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cc: All Counsel of Record

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